

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 05-1849 JH

GEORGE OSGOOD,

Defendant.

**DEFENDANT GEORGE OSGOOD'S NOTICE OF JOINDER IN
PREVIOUSLY FILED MOTIONS BY DEFENSE CO-COUNSEL**

Defendant George Osgood, by and through counsel of Record Amy Sirignano, of the Law Office of Amy Sirignano, PC, and pursuant to Local Rule 47.6 of the Local Rules for Criminal Proceedings in the United States District Court , hereby joins in various pretrial motions previously filed by co-defendants, and states the following:

1. This filing is made in order to perfect the record on appeal for defendant George Osgood.
2. AUSA James Braun, was contacted via telephone, and has been notified of the filing of this Joinder.
3. The superseding indictment in this case was filed on April 25, 2006 (Doc. 414).

4. There are 28 defendants in this matter, many who have already filed discovery and substantive motions in this case.

5. There are over 1578 entries in the case docket, including a number of pending motions.

6. Counsel for Mr. Osgood was appointed on January 14, 2009. (Doc. 1507).

7. Mr. Osgood's discovery and pretrial Motions deadline is May 5, 2009. (Doc. 1534)

8. The Court vacated the April 28, 2009 motions hearing on April 1, 2009. (Doc. 1574 Text Only)

9. Defendant Osgood joins the following listed motions, and reserves the right to supplement this Notice of Joinder if, at a later time prior to trial, it becomes necessary to supplement his request:

-Joint Motion by Defendants to Compel Discovery related to the Interception of Electronic Communications (Doc. 573);

-Motion to Exclude Consideration of the Contents of Specific Wiretapped Phone Call at Any Future Proceeding by Dana Jarvis (Regarding Minimization)(Doc. 616);

- Motion to Dismiss the Forfeiture Allegations or in the Alternative for a Bill of Particulars by Dana Jarvis (Doc. 697);
- Notice by Dana Jarvis of Demand for Jury Trial on Forfeiture Allegation pursuant to Fed. R. Crim. P. 32.2(b)(4). (Docs. 704, 706);
- Motion for Determination of Admissibility of Co-Conspirators' statements by Greg Hill (Doc. 707);
- Defendant's Joint Motion to Dismiss Count 3 or in the Alternative a Bill of Particulars by Dana Jarvis (Doc. 710);
- Motion for a Bill of Particulars as to Count 3 and the Forfeiture Allegation of the Superseding Indictment by Ayla Jarvis (Doc. 713);
- Motion for Severance from co-defendants by Ayla Jarvis (Doc. 714);
- Unopposed Motion to Compel Production of Grand Jury Transcripts pursuant to Fed. R. Crim. P 6(e) by Dana Jarvis (Doc. 719);
- Motion to Sever Trial from co-defendants by Dana Jarvis (Doc. 721);
- Defendant's Joint Motion for Disclosure and Production of Confidential Informants (Doc. 722);
- Joint Motion to Sever Counts I and II on grounds of Misjoinder and Prejudicial Joinder under FRCP 8 & 14 (Doc. 723);

-Motion in Limine Re Excluding All Opinion Testimony from the Governments Case-In-Chief by Dennis Wilson (Doc. 724);

-Motion and Supporting Memorandum to Exclude the Admissibility of Co-Conspirator Statements by Dennis Wilson (Doc. 725);

-Motion and Supporting Memorandum for Discovery Regarding Prior Criminal Acts by Government Witnesses and Information Necessary to Effectively Cross-Examine Government Witnesses by Dennis Wilson (Doc. 726);

-Motion to Dismiss Indictment, or, in the Alternative, for a Bill of Particulars by Dennis Wilson (Doc. 728);

-Motion & Supporting Points/Authorities for Co-conspirator Statements and Alternatively for Release of Brady Materials by Defendant George Ripley (Doc. 729);

-Motion & Supporting Points and Authorities for Co-Conspirator Statement and Alternatively for Release of Brady Materials by Dakota Fitzner (Doc. 730);

-Motion and Supporting Points and Authorities to Dismiss Count 1 or for a Bill of Particulars by Dakota Fitzner (Doc. 731);

- Amended Unopposed Motion for Determination of Admissibility of Co-Conspirators' statements by Greg Hill (Doc. 735);
- Joint Motion to Compel Discovery Re: Conspiracies form 1990 to 1999 by defendants (Doc. 740);
- Joint Reply to Defendants to Response to the Joint Motion to Compel Discover Related to the Interception of Electronic Communications (Doc. 770);
- Joint Reply by Defendants to the Government's Response to Joint Motion, or in the Alternative, to Reconsider the Court's Partial Denial of Defendants Motions (Doc. 788);
- Reply by Defendant Dana Jarvis to Response to Motion for Disclosure and Production of Confidential Informants (Doc. 816);
- Motion and Reply for FRCP 12(b)(4)(B) designation by the USA of its Intent to Offer Evidence in its Case in Chief by Dana Jarvis (Docs. 836/852);
- Joint Reply to Response to Motion by Dana Jarvis to Dismiss Count III, or, in the Alternative, Motion for a Bill of Particulars Pursuant to FRCP 7(c)(1), 7(f) & 12(b)(3)(B). (Doc. 865);
- Reply to Government's Response to Motion by Dana Jarvis to Defendants'

Joint Motion to Sever Counts I and III (Doc. 877);

- Defendant Dana Jarvis' Motion and Renewed Motion to Clarify Status of Pleadings and Orders Filed Between 9/1/06 and 09/24/07 (Docs. 1234, 1309);

-Notice Regarding Missing and Undesignated Discovery, Illegible Production and Motion to Produce Same (Doc. 1391);

-Motion to Supplement Memorandum in Support Of Previously Filed Discovery Motions by David Reid (Doc. 1532); and

-All Severance Motions, including, but not limited to: Doc. 710, 714, 727, 1523.

Respectfully submitted,

/s/ _____
Amy Sirignano
1011 Lomas Boulevard NW
Albuquerque, NM 87102
(505) 242-2770
(505) 242-2774 facsimile
amy@abqnmlaw.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2009, I filed the foregoing motion electronically through the CM/ECF system, which caused all counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing and, sent a copy to AUSA James Braun via facsimile at 505-346-7296.

/s _____
Amy Sirignano